

Richard A. Lesser - #5832
Steven M. McGuire, *Pro Hac Vice*
LESSER & ASSOCIATES, PLC
1 Pearl Street
Redondo Beach, CA 90277
Telephone: (310) 374-4808
Facsimile: (310) 372-7715

Attorneys for Claimants/Respondents and
Plaintiffs MATTHEW ISHAM, individually and
as Guardian ad Litem for, HAYDEN ISHAM,
a minor and ROXANNE BEST ISHAM

UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

IN THE MATTER OF THE) Civil NO. CV05-00037 HG-BMK
COMPLAINT OF BLUE) [3 Consolidated Cases]
DOLPHIN CHARTERS, LTD.)
AND TERRY DONNELLY, AS) NOTICE OF ACCEPTANCE OF BLUE
OWNERS OF THE VESSEL) DOLPHIN CHARTER LTD AND TERRY
M/V BLUE DOLPHIN, O/N) DONNELLY'S AMENDED OFFER TO
1082213, FOR) ALLOW MONEY JUDGEMENT TO BE
EXONERATION FROM) TAKEN AGAINST LIMITATION
AND/OR LIMITATION OF) PLAINTIFF/DEFENDANT BLUE
LIABILITY) DOLPHIN CHARTERS LTD. AND
) LIMITATION PLAINTIFF TERRY
) DONNELLY IN FAVOR OF
) PLAINTIFF/LIMITATION CLAIMANT
) MATTHEW ISHAM INDIVIDUALLY,
) PURSUANT TO RULE 68 OF THE
) FEDERAL RULES OF CIVIL
) PROCEDURE; DECLARATION OF
) RICHARD A. LESSER; CERTIFICATE
) OF SERVICE

MATTHEW ISHAM,) CIVIL NO.: CV 04 00559 HG-BMK
individually and as Guardian Ad)
Litem for HAYDEN ISHAM, a)
minor; ROXANNE BEST)
ISHAM,)
)
Plaintiffs,)
)
vs.)
)
BLUE DOLPHIN CHARTERS,)
LTD. and BLUE DOLPHIN)
DIVING, LTD., CAPTAIN)
ANDY'S SAILING, INC.,)
DOES 1 - 50,)
)
Defendants.)
)

DENNIS CLAYPOOL,) CIVIL NO.: CV 04 00570 HG-BMK
individually and as Guardian ad)
Litem for KRISTEN)
CLAYPOOL, a minor, SHERYL)
CLAYPOOL, SCOTT)
CLAYPOOL, AND KRISTEN)
CLAYPOOL,)
)
Plaintiffs,)
)
vs.)
)
CAPTAIN ANDY'S SAILING,)
INC., BLUE DOLPHIN)
CHARTERS, LTD. And BLUE)
DOLPHIN DIVING, LTD.,)
)
Defendants.)
)

NOTICE OF ACCEPTANCE OF BLUE DOLPHIN CHARTERS LTD
AND TERRY DONNELLY'S AMENDED OFFER TO ALLOW MONEY
JUDGEMENT TO BE TAKEN AGAINST LIMITATION
PLAINTIFF/DEFENDANT BLUE DOLPHIN CHARTERS, LTD
AND LIMITATION PLAINTIFF TERRY DONNELLY,
IN FAVOR OF PLAINTIFF/LIMITATION CLAIMANT
MATTHEW ISHAM, INDIVIDUALLY, PURSUANT TO
RULE 68 OF THE FEDERAL RULES OF CIVIL PROCEDURE

COMES NOW MATTHEW ISHAM, INDIVIDUALLY, Plaintiff and
Limitation Claimant in the above entitled action and pursuant to Rule 68 of the
Federal Rules of Civil Procedure, hereby gives notice of his acceptance of the
Amended Offer of Judgment made by Blue Dolphin Charters, Ltd and Terry
Donnelly.

This notice is given on the basis of the attached Declaration of Counsel and
the Original Amended Offer to Allow Money Judgement to be Taken against
Limitation Plaintiff/Defendant Blue Dolphin Charters, Ltd. and Limitation
Plaintiff Terry Donnelly, in Favor of Matthew Isham, Individually, attached
hereto, the file and record in this case, and Rule 68 of the Federal Rules of Civil
Procedure.

Dated: Redondo Beach, California February 21, 2006.

LESSER & ASSOCIATES, PLC

/s/ Steven M. McGuire

STEVEN M. McGUIRE

Attorneys for Claimants/Respondents
and Plaintiffs MATTHEW ISHAM, individually
and as Guardian ad Litem for, HAYDEN ISHAM,
a minor and ROXANNE BEST ISHAM

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